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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

MDL NO. 2843  
Case No. 18-md-02843-VC

Hon. Vince Chhabria

**DECLARATION OF SHANA E.  
SCARLETT IN SUPPORT OF *KLEIN*  
PLAINTIFFS' ADMINISTRATIVE  
MOTION FOR LEAVE TO FILED UNDER  
SEAL**

This Document Relates To: All Actions

1 I, Shana Scarlett, state under oath, as follows:

2 1. I am a partner at the law firm of Hagens Berman Sobol Shapiro LLP and serve as  
3 counsel for the *Klein* Plaintiffs (Maximilian Klein, Sarah Grabert, and Rachel Banks Kupcho), as  
4 well as court-appointed interim co-lead Consumer Class counsel in the case captioned *Klein v.*  
5 *Meta Platforms, Inc.*, Case No. 3:20-cv-08570-JD (N.D. Cal.). I make this declaration of my own  
6 personal, firsthand knowledge, and if called and sworn as a witness, I could and would  
7 competently testify as follows.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Declaration of  
9 Maximilian Klein in Support of *Klein* Plaintiffs' Statement of Objection to Release in *Facebook,*  
10 *Inc. Consumer Privacy User Profile Litigation* Settlement Agreement in unredacted form. The  
11 portions of the declaration sought to be sealed have been highlighted.

12 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Declaration of Sarah  
13 Grabert in Support of *Klein* Plaintiffs' Statement of Objection to Release in *Facebook, Inc.*  
14 *Consumer Privacy User Profile Litigation* Settlement Agreement in unredacted form. The  
15 portions of the declaration sought to be sealed have been highlighted.

16 4. Attached hereto as **Exhibit 3** is a true and correct copy of the Declaration of  
17 Rachel Banks Kupcho in Support of *Klein* Plaintiffs' Statement of Objection to Release in  
18 *Facebook, Inc. Consumer Privacy User Profile Litigation* Settlement Agreement in unredacted  
19 form. The portions of the declaration sought to be sealed have been highlighted.

20 5. *Klein* Plaintiffs seek leave to seal portions of their declarations in support of *Klein*  
21 Plaintiffs' Statement of Objection to Release in *Facebook, Inc. Consumer Privacy User Profile*  
22 *Litigation* Settlement Agreement because the information contained therein is their personal  
23 identifying information.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on this 26th day of July, 2023, in Berkeley, California.

26 /s/ Shana E. Scarlett  
27 Shana E. Scarlett  
28